

SHEARMAN & STERLING LLP

599 Lexington Avenue
New York, NY 10022-6069
+1.212.848.4000

Dennis.Kitt@shearman.com
212.848.7462

January 13, 2023

VIA ECF

Honorable Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Justin E. Baerga, et al. v. City of New York, et al., No. 21 Civ. 5762-PAC (S.D.N.Y.)

Dear Judge Crotty:

We represent plaintiffs Justin Baerga, Steven Greene, Giovanna Sanchez-Esquivel, Sarah Arvio, Community Access, Inc., National Alliance on Mental Illness of New York City, Inc., and Correct Crisis Intervention Today - NYC. We write on behalf of all plaintiffs, pursuant to Rules 1.A and 1.E of Your Honor's Individual Practices, to respectfully request a two-day extension of time for plaintiffs to file their reply to the opposition to the motion for expedited discovery from January 18, 2023, to January 20, 2023. This extension is requested to provide adequate time to respond to defendants' 25-page opposition (Dkt. 131) to the plaintiffs' seven-page motion for expedited discovery (Dkt. 122). Plaintiffs have conferred with counsel for defendants, who consents to the extension. The plaintiffs have previously requested an extension on one other occasion, in connection with briefing defendants' motion to stay discovery, which the Court granted on August 1, 2022 (Dkt. 95).

Respectfully submitted,

/s/ Dennis Kitt
Dennis Kitt

Hon. Paul A. Crotty
Page 2

January 13, 2023

cc: All Counsel of Record (via ECF)

SO ORDERED

The Honorable Paul A. Crotty

Dated: _____